



0000-0000-0004-7803

Document Control Sheet

Sheet Title:	AIR CP 20 BP
Box ID:	5586
Control Sheet ID:	0000-0000-0004-7803
Record Series Name:	OCE / Air Compliance
Record Series:	AIR CP
Primary ID:	109753731
Secondary ID:	
Doc Type:	Compliance
Security:	Public
Date:	2/6/2018
Title:	Investigation
Tertiary ID	1471593

AIR CP _109753731_CP_20180206_Investigation_1471593_.pdf
Texas Commission on Environmental Quality
Investigation Report

The TCEQ is committed to accessibility. If you need assistance in accessing this document, please contact oce@tceq.texas.gov

Customer: GCGV Asset Holding LLC
Customer Number: CN605357219

Regulated Entity Name: GULF COAST GROWTH VENTURES PROJECT

Regulated Entity Number: RN109753731

Investigation # 1471593

Incident Numbers

277818

Investigator: SUSAN HOELSCHER

Site Classification PREVENTION OF
SIGNIFICANT
DETERIORATION
GREENHOUSE GAS PSD
CASE-BY-CASE

Conducted: 02/06/2018 -- 02/06/2018

SIC Code: 2869

NAIC Code: 325199

Program(s): AIR NEW SOURCE PERMITS

Investigation Type: Compliance Investigation

Location: SOUTH OF HIGHWAY 181 AND WEST OF
FM RD 2986

Additional ID(s): PSDTX1518
GHGPSDTX170
146425

Address: ,
, ,

Local Unit: REGION 14 - CORPUS CHRISTI

Activity Type(s): AIRCOMPL - AIR CMPL - AIR
COMPLAINT INV

Principal(s):

Role

Name

RESPONDENT

GCGV ASSET HOLDING LLC

RECEIVED

MAR 28 2018

Contact(s):

**TCEQ
CENTRAL FILE ROOM**

Role

Title

Name

Phone

REGULATED
ENTITY
CONTACT

PUBLIC &
GOVERNMENT AFFAIRS
ADVISOR

JARED YOUNG

Work (361) 704-6391

REGULATED
ENTITY MAIL
CONTACT

PRESIDENT

MR WILLIAM H
CHEEK

Phone (832) 625-4775

PARTICIPATED
IN

SITE MANAGER

MICHAEL STINNETT

Cell (713) 806-9566
Work (832) 624-3125

Other Staff Member(s):

Role	Name
Supervisor	KELLY RUBLE
Investigator	GUADALUPE LOPEZ
Supervisor	GUADALUPE LOPEZ
Investigator	JAY HALEPESKA

Associated Check List**Checklist Name**

AIR COMPLAINT INVESTIGATION

Unit Name

277818

Investigation Comments:**I.INTRODUCTION****Introduction**

On February 6, 2018, Ms. Susan Hoelscher-Texas Commission on Environmental Quality (TCEQ) Corpus Christi Region 14 (R14) Air Section Environmental Investigator (EI), Mr. Guadalupe Lopez-TCEQ R14 Air Section Work Leader, and Mr. Jay Halepeska-TCEQ R14 Water Section EI (Investigative Team) conducted an air complaint investigation (AIR CMPL) in response to a citizen's allegations that Gulf Coast Growth Ventures Project (GCGV) was conducting construction activities prior to issuance of their permit (Incident No. 277818). GCGV's Air New Source Review (NSR) Permit No. 146425 is currently pending. The purpose of the AIR CMPL investigation was to determine what pre-construction activities were being conducted and if those activities were approved pre-construction activities as per TCEQ rules and regulations.

GCGV is located south of US Highway 181 and west of Farm to Market (FM) Road 2986 in Gregory, San Patricio County, Texas. (Note: GCGV is a joint venture between ExxonMobil Chemical Company and Saudi Basic Industries Corporation.) The contacts for GCGV were Mr. Jared Young-Public and Government Affairs Advisor, Mr. Michael Stinnett-Site Manager (contractor), and Mr. William H. Cheek-President.

Daily Narrative

On February 6, 2018, the Investigative Team met with Mr. Young at the GCGV office located in Portland, San Patricio County, Texas and discussed the pre-construction activities currently being conducted at GCGV. GCGV has poured a concrete slab to build a safety training facility for training of the construction workers when work starts on the plant. Some old pipelines have been removed completely, and some pipelines are being moved from running through the center of the property to going around the property. There have not been any new pipelines installed. Electrical lines have also been moved. GCGV has started to put up a chain link fence, cut the soil, and construct caliche roads for travel through the property. Mr. Stinnett was contacted to be available if the Investigative Team had any further questions during their surveillance of GCGV.

The Investigative Team traveled to GCGV and conducted a surveillance of pre-construction activities mentioned above. During the surveillance, it was also noted that GCGV had silt fencing (structural control) and a vegetative buffer (best management practice) as required by GCGV's stormwater permit.

Exit Interview

Since non-compliance issues were not evaluated during the AIR CMPL investigation, the Exit Interview Protocol was not utilized.

II. GENERAL FACILITY AND PROCESS INFORMATION**Process Description**

GCGV Asset Holding LLC will construct a new organic chemical manufacturing facility. A more detailed process description can be found in the TCEQ R14 Office files.

III. BACKGROUND

Performance Classification and Compliance Rating

Customer Number (CN): CN605357219

Classification: Unclassified

Rating: N/A

Regulated Entity Number (RN): RN109753731

Classification: Unclassified

Rating: N/A

Note: 30 TAC §60.2 - Compliance History Classification (Point Ranges):

High Performer (above-satisfactory compliance record) = fewer than 0.10 points;

Satisfactory Performer (generally complies with environmental regulations) = 0.10 to 55 points;

Unsatisfactory Performer (performs below minimal acceptable performance standards established by the commission) = more than 55 points

Agreed Orders, Court Orders, and Other Compliance Agreements

GCGV is not presently subject to any Agreed Orders, Court Orders, or Other Compliance Agreements.

Prior Enforcement Issues

GCGV has not been the subject of air related enforcement issues in the previous five years.

Complaints

Prior to this investigation, GCGV has not been the subject of any air related complaints in the previous two years.

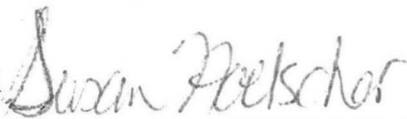
IV. ADDITIONAL INFORMATION

Conclusions, Recommendations and Current Enforcement Issues

At the time of the investigation, GCGV was conducting approved pre-construction activities; therefore, no further action is warranted at this time.

No Violations Associated to this Investigation

Signed

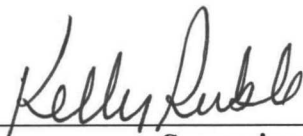


Environmental Investigator

Date

3/8/18

Signed



Supervisor

Date

3/15/18

Attachments: (in order of final report submittal)

___ Enforcement Action Request (EAR)

☒ Letter to Facility (specify type) : General Compliance
(GC)

___ Investigation Report

___ Sample Analysis Results

___ Manifests

___ Notice of Registration

___ Maps, Plans, Sketches

___ Photographs

___ Correspondence from the facility

___ Other (specify) :

TCEQ Complaint Report

03/08/2018
8:40:32AM

Incident No: 277818

Media Type: AIR

Start Date: Unknown

Received Date: 02/02/2018

Method : EMAIL

Staff Member: SHOELSCH

Status: Closed

Status Date: 02/14/2018

Priority: Within 5 Working Days

Regulated Entity: GULF COAST GROWTH VENTURES PROJECT

RN109753731

Address:

SAN PATRICIO County

Physical Location: SOUTH OF HIGHWAY 181 AND WEST OF FM RD 2986

Responsible Party: GCGV ASSET HOLDING LLC

Title:

Address: 10375 RICHMOND AVE, HOUSTON, TX 77042

PHONE

Number Complaining: 1

Frequency: CURRENT

Alleged Source: GULF COAST GROWTH VENTURES
PROJECT

Program Group: AIR QUALITY -
HIGH LEVEL

Nature: CONSTRUCTI

Effect: ENVIRONMENTAL

Initial Problem

The complainant is alleging construction activities prior to having authorization.

Action Taken

This complaint has been assigned and will be further investigated by an Environmental Investigator.

Closure Comments

More information will be available upon approval of the investigation report.

Investigation Number: 1471593

Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Jon Niermann, *Commissioner*
Richard A. Hyde, P.E., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

March 15, 2018

Mr. William Cheek
President
GCGV Asset Holding LLC
10375 Richmond Ave, Ste. 1800
Houston, Texas 77042-4188

Re: Results of an Air Complaint Investigation at:
Gulf Coast Growth Ventures Project, Located south of US Highway 181 and west
of Farm to Market (FM) Road 2986, Gregory (San Patricio County), Texas
Regulated Entity No.: 109753731; Investigation No.: 1471593; Incident No.: 277818

Dear Mr. Cheek:

On February 6, 2018, Ms. Susan Hoelscher, Mr. Guadalupe Lopez, and Mr. Jay Halepeska of the Texas Commission on Environmental Quality (TCEQ) Corpus Christi Region Office conducted an investigation at the above-referenced site to evaluate compliance with applicable requirements for air quality. No violations are being alleged as a result of this investigation.

The TCEQ appreciates your assistance in this matter and your compliance efforts to ensure protection of the State's environment. If you or members of your staff have any questions regarding this matter, please feel free to contact Ms. Hoelscher in the Corpus Christi Region Office at (361) 825-3100.

Sincerely,

A handwritten signature in black ink that reads "Kelly Ruble".

Kelly Edward Ruble
Air Section Manager
Corpus Christi Regional Office

KER/SMH/mjd

cc: Mr. Jared Young, Public and Government Affairs Advisor, Exxon Mobil, PO Box 367,
Gregory, Texas 78359-0367